

May 3, 2012

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/ Audrey D. Robinson

SUBJECT: Approval for Marshall Acting Center Director to Attend the Welcome Reception and Dinner for the German Ambassador to the United States

In accordance with 5 CFR § 2635.204(g)(2) and (3), I make the following determination:

The Marshall Acting Center Director has been invited to attend the welcome reception and dinner for Dr. Peter Ammon, Federal Republic of Germany Ambassador to the United States, sponsored by the University of Alabama in Huntsville. This event will be held on Friday, May 4, at the U.S. Space and Rocket Center (USSRC) Davidson Center.

This event will be a widely attended gathering of local elected officials, academia, and business and community leaders. The event is valued at \$48.95 per person. The cost for all attendees is free. UA Huntsville is paying for the cost of the dinner. There are 90 people invited to the reception and dinner. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2).

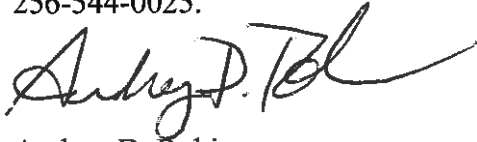
The Acting Center Director presently, or may in the near future, have extensive involvement in matters relating to the University of Alabama in Huntsville. NASA has several research grants and cooperative agreements with UA Huntsville. I have determined that free attendance of the Acting Center Director and his spouse at the event is in the interests of the agency because it will further agency programs and operations. His attendance will help to raise NASA's profile with academia and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having the Acting Center Director attend this event outweighs any concern that free attendance may, or may appear to improperly influence him in the performance of his duties.

Accordingly, the Acting Center Director may accept free attendance for himself and his spouse at the event.

The University of Alabama in Huntsville is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson". The signature is fluid and cursive, with a large initial "A" and "R".

Audrey D. Robinson
Chief Counsel